

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Dr. Keith Jordan and Barbara Griffin,)
Plaintiffs,)

v.)

City Colleges of Chicago,)
a Municipal Corporation,)
Rosie Inwang, Dr. Charles Green)
and Dr. Therese Bushner,)
Defendants.)

Civil Action No.

ED-7
FILED FOR DOCKETING
04 NOV -3 PM 2:00
CLERK
U.S. DISTRICT COURT

JUDGE BUCKLO

040 7094

MAGISTRATE JUDGE KEYS

DOCKETED

NOV 04 2004

COMPLAINT

Plaintiffs, **Dr. Keith Jordan and Barbara Griffin** ("Plaintiffs") complain against
Defendants **City Colleges of Chicago, Rosie Inwang, Dr. Charles Green, Dr. Therese Bushner**
("Defendants") as follows:

JURISDICTION AND VENUE

1) This action seeks to redress Defendant's employment discrimination against Plaintiffs based on race and sexual discrimination in violation of Title VII of the Civil Rights Act of 1964, as amended, ("Title VII") 42 U.S.C. Section 2000 *et seq.*

2) Jurisdiction of this Court is invoked pursuant to 28 U.S.C. Sections 1331, 1337, 1343 and (5)(f)(1)(3) of Title VII 42 U.S.C. Section 2000e (5)(f)(1)(3).

3) The unlawful employment practices alleged herein were and are now being committed within the Northern District of Illinois. Thus, venue in this District is proper.

4) This action also seeks to redress Defendant's tortuous acts against Plaintiffs based on Illinois common.

5) Jurisdiction of this Court is also invoked pursuant to 28 U.S.C. Section 1367 (a) and (b).

6) The tortuous acts alleged herein were and are now being committed within the Northern District of Illinois. Thus, venue in this District is proper.

PARTIES

7) At all relevant times, Defendant City Colleges of Chicago is an Illinois Municipal Corporation created under the laws of the State of Illinois for the purpose of providing the public with vocational training and college level education leading to the conferring of associate degrees. Its principal place of business is Cook County, Illinois. and as such is an employer engaged in an industry affecting commerce. Defendant Rosie Inwang is a citizen and a resident of Cook County, Illinois and at all times mentioned below was employed by the Defendant City Colleges as dean of the Department of Career Programs at Olive - Harvey College in the City of Chicago.

Defendant Dr. Charles Green is a citizen and a resident Cook County, Illinois and at all times mentioned below was employed by the Defendant City Colleges as interim President of Olive Harvey College in the City of Chicago, Cook County, Illinois. Therese Bushner is a citizen and a resident of Wayne County, Michigan and at all times mentioned below was employed by the Defendant City Colleges as Vice President of Academic Affairs at Olive - Harvey College in the City of Chicago, Cook County, Illinois.

STATEMENT OF CLAIM

Count I

8) Plaintiff Dr. Keith Jordan was hired by Defendant City Colleges on January 15 1979 as an instructor of mathematics for the Defendant City Colleges. He is currently employed by the Defendant City Colleges as a tenured full professor of mathematics at Olive - Harvey College in the City of Chicago, Cook County, Illinois.

9) Plaintiff Barbara Griffin was hired by Defendant City Colleges on April 18, 1988 as an assistant professor of Data Processing for the Defendant City Colleges. She is currently on medical leave from employment by the Defendant City Colleges as a tenured assistant professor of Computer Information Systems at Olive - Harvey College in the City of Chicago, Cook County, Illinois.

10) Plaintiff has satisfied all conditions precedent by filing timely charges with the Equal Employment Opportunity Commission ("EEOC"), attached hereto as Exhibit "A" The EQUAL EMPLOYMENT OPPORTUNITY COMMISSION has issued a right to sue letter, attached hereto as Exhibit "B".

11) Since at least May 2, 2002, and continuously through the present, the Defendants have continuously and intentionally discriminated against Plaintiff Barbara Griffin on account of her race (black) and sex and intentionally discriminated against Plaintiff Keith Jordan on account of his race (black) and age as opposed to similarly situated white males. Defendants have also continuously and intentionally created a hostile employment environment in retaliation to the Plaintiffs objecting to discriminatory employment practices in violations of Section 703(a)(1) of Title VII 42 U.S.C. Section 2000e-2(a)(1). These unlawful practices include but are not limited to:

a) subjecting them to disciplinary solely for their objection to Defendants'

discriminatory employment practices;

- b) subjecting them to unequal terms and conditions of employment; and
- c) depriving them of certain employment benefits with respect to salaries, benefits, and assignments.

12) At all times Plaintiffs performed their duties consistent with the Defendant City Colleges of Chicago rules and requirements.

13) The Defendant's discriminatory and unlawful employment practices toward Plaintiffs were conceived and carried out intentionally, and with malice and/or reckless indifference to their federally protected rights.

14) The effect of the practices complained of herein have deprived and continue to deprive Plaintiffs of the rights secured to them by Title VII.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiffs ask that this Court:

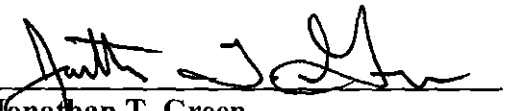
- A. Grant a permanent injunction enjoining Defendant, its officers, agents, employees, successors, assigns, and all other persons in active concert or participation with it, from discriminating unlawfully against Plaintiffs;
- B. Order the Defendants to make Plaintiffs whole by awarding their back pay, with interest, in an amount to be proved at trial;
- C. Award Plaintiffs compensatory and punitive damages in accordance with with the Civil Rights Act of 1991, 42 U.S.C. Section 1981a;

D. Award Plaintiffs such other relief as may be necessary to remedy the effects of the Defendant's unlawful employment practices;

E. Award Plaintiffs such other relief as this Court deems necessary and appropriate; and,

F. Award Plaintiffs their costs and attorneys' fees in this action.

Respectfully submitted,

By: 
Jonathan T. Green
Attorney for Dr. Keith Jordan and Barbara Griffin

Count II

15) Plaintiffs repeat and realledge herein the allegations complained in paragraphs 1-14.

16) The terms and conditions of Plaintiffs employment were governed by a handbook and policy manual issued by Defendant City Colleges and provided that Defendant would treat its employees fairly.

17) That Defendants deliberately harassed Plaintiffs with the intention of forcing Plaintiffs to resign from their employment with the Defendant City Colleges of Chicago.

18) Defendants' conduct was extreme and outrageous. They encouraged the faculty, students and the administration of Olive Harvey College to behave unprofessionally, irrationally and

recklessly, by intimidation and threats, causing Plaintiffs great anxiety in trying to perform their duties.

19) Plaintiffs have experienced anxiety and frustration because Defendants' conduct created a situation wherein their students felt free to threaten and coerce them.

20) Plaintiffs have suffered severe emotional distress and have been compelled to seek medical treatment.

21) Defendants knew that severe emotional distress was certain or substantially certain to result from their conduct.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiffs ask that this Court:

A. Grant a permanent injunction enjoining Defendant, its officers, agents, employees, successors, assigns, and all other persons in active concert or participation with it, from discriminating unlawfully against Plaintiffs;

B. Order the Defendants to make Plaintiff's whole by awarding their back pay, with interest, in an amount to be proved at trial;

C. Award Plaintiffs such other relief as may be necessary to remedy the effects of the Defendant's unlawful employment practices;

D. Award Plaintiffs such other relief as this Court deems necessary and appropriate; and,

E. Award Plaintiffs their costs and attorneys' fees in this action.

Respectfully submitted,

By:

A handwritten signature in black ink, appearing to read "Jonathan T. Green", written over a horizontal line.

Jonathan T. Green

**Attorney for Dr. Keith Jordan and Barbara
Griffin**

Form 5 (5/01)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

☐ FEPA☒ EEOC

210-2004-05033

Illinois Department Of Human Rights

and EEOC

State or local Agency, if any

Name (Indicate Mr., Ms., Mrs.)

Barbara Griffin

Home Phone No. (Incl Area Code)

(773) 259-5439

Date of Birth

10-11-1955

Street Address

City, State and ZIP Code

344 South Jeffery Blvd, Chicago, IL 60617

I am the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

CITY COLLEGE OF CHICAGO

No. Employees, Members

101 - 200

Phone No. (Include Area Code)

(312) 855-3022

Street Address

City, State and ZIP Code

26 W Jackson Blvd, Chgo, IL 60606

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

☒ RACE ☐ COLOR ☒ SEX ☐ RELIGION ☐ NATIONAL ORIGIN
☒ RETALIATION ☒ AGE ☐ DISABILITY ☐ OTHER (Specify below.)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

05-01-2002

01-01-2004

☒ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I was hired by the above named Respondent on or around April 18, 1988, and my current position is Professor. I have been subjected to a hostile work environment during my employment. In Spring of 2003, I filed a lawsuit against the Respondent. I have been subjected to different terms and conditions of my employment such as three disciplinary hearings, denied appeal rights and harassment. In January of 2004, I was suspended.

I believe I have been discriminated against based on my sex, Female, race, Black, and age, 48 (dob: 10/11/1955) and retaliation, in violation of Title VII of the Civil Rights Act of 1964, as amended, and the Age Discrimination in Employment Act of 1967, as amended.

RECEIVED EEOC

MAY 27 2004

CHICAGO DISTRICT OFFICE

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

May 27, 2004

Date

Charging Party Signature

E-11-11-11

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE

(Issued on request)

To: Barbara Griffin
8944 South Jeffery Blvd.
Chicago, IL 60617

CERT. MAIL #: 7099 3400 0006 730 3 2827 C/P



On behalf of a person aggrieved whose identity is **CONFIDENTIAL**
(29 C.F.R. 1601.7(a))

From:

Chicago District Office
Equal Employment Opportunity Commission
500 West Madison Street, Suite 2800
Chicago, IL 60661-2511

Charge Number

210-2004-05033

EEOC Representative

Regina Husar, Enforcement Supervisor

Telephone Number

(312) 353-0819

(See the additional information attached to this form)

TO THE PERSON AGGRIEVED: This is your NOTICE OF RIGHT TO SUE. It is issued at your request. If you intend to sue the respondent(s) named in your charge, YOU MUST DO SO WITHIN NINETY (90) DAYS OF YOUR RECEIPT OF THIS NOTICE. OTHERWISE YOUR RIGHT TO SUE IS LOST.



More than 180 days have expired since the filing of this charge.



Less than 180 days have expired since the filing of this charge, but I have determined that the Commission will be unable to complete its process within 180 days from the filing of the charge.



With the issuance of this NOTICE OF RIGHT TO SUE, the Commission is terminating its process with respect to this charge.



It has been determined that the Commission will continue to investigate your charge.



ADEA: While Title VII and the ADA require EEOC to issue this notice of right to sue before you can bring a lawsuit, you may sue under the Age Discrimination in Employment Act (ADEA) any time 60 days after your charge was filed until **90 days after you received notice that EEOC has completed action on your charge.**



Because EEOC is closing your case, your lawsuit under the ADEA must be brought within 90 days of your receipt of this notice. Otherwise, your right to sue is lost.



EEOC is continuing its investigation. You will be notified when we have completed action and, if appropriate, our notice will include notice of right to sue under the ADEA.



EPA: While Title VII and the ADA require EEOC to issue this Notice of Right to Sue before you can bring a lawsuit, you already have the right to sue under the Equal Pay Act (EPA) (You are not required to complain to any enforcement agency before bringing an EPA suit in court). EPA suits must be brought within 2 years (3 years for willful violations) of the alleged EPA underpayment.

JUL 27 2004

(Date)

On Behalf of the Commission

John P. Rowe
John P. Rowe, District Director

Enclosures

Information Sheet
Copy of Charge

cc: Respondent(s)

City College of Chicago

Exhibit "B"

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE

(Issued on request)

To: Keith T. Jordan

8037 S. Champlain Ave.

Chicago, Illinois 60619

From:

Equal Employment Opportunity Commission

Chicago District Office

500 West Madison Street, Suite 2800

Chicago, Illinois 60661-2511



On behalf of a person aggrieved whose identity is CONFIDENTIAL

(29 C.F.R. 1601.7(a))

Charge Number

210-2004-05034

EEOC Representative

Konrad Batog, Investigator

Telephone Number

(312) 353-8900

(See the additional information attached to this form)

TO THE PERSON AGGRIEVED: This is your NOTICE OF RIGHT TO SUE. It is issued at your request. If you intend to sue the respondent(s) named in your charge, YOU MUST DO SO WITHIN NINETY (90) DAYS OF YOUR RECEIPT OF THIS NOTICE: OTHERWISE YOUR RIGHT TO SUE IS LOST.



More than 180 days have expired since the filing of this charge.



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ADEA: While Title VII and the ADA require EEOC to issue this notice of right to sue before you can bring a lawsuit, you may sue under the Age Discrimination in Employment Act (ADEA) any time 60 days after your charge was filed until 90 days after you received notice that EEOC has completed action on your charge.



Because EEOC is closing your case, your lawsuit under the ADEA must be brought within 90 days of your receipt of this notice. Otherwise, your right to sue is lost.



EEOC is continuing its investigation. You will be notified when we have completed action and, if appropriate, our notice will include notice of right to sue under the ADEA.

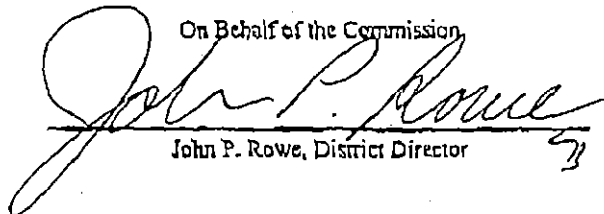


EPA: While Title VII and the ADA require EEOC to issue this Notice of Right to Sue before you can bring a lawsuit, you already have the right to sue under the Equal Pay Act (EPA) (You are not required to complain to any enforcement agency before bringing an EPA suit in court). EPA suits must be brought within 2 years (3 years for willful violations) of the alleged EPA underpayment.

7-23-04

(Date)

On Behalf of the Commission



John P. Rowe, District Director

Enclosures

 Information Sheet
 Copy of Charge

cc Respondent(s)

Chicago City Colleges

ED-7
FILED FOR DOCKETING

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

04 NOV -3 PM 2:05

Civil Cover Sheet

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Northern District of Illinois.

Plaintiff(s): Keith Jordan Barbara Griffin

County of Residence: Cook

Plaintiff's Atty: Jonathan T. Green

7817 S. Luella, Chicago, IL
60649
773-374-6040

**Defendant(s): City Colleges of Chicago Rosie
Inwang Dr. Charles Green Dr. Therese Bushner**

County of Residence: Cook **JUDGE BUCKLO**

Defendant's Atty:

04C 7094

II. Basis of Jurisdiction:

3. Federal Question (U.S. not a party)

III. Citizenship of Principal
Parties (Diversity Cases Only)

Plaintiff: -N/A
Defendant: -N/A

MAGISTRATE JUDGE KEYS

NOV 04 2004

IV. Origin :

1. Original Proceeding

V. Nature of Suit:

442 Employment

VI. Cause of Action:

**Title VII of Civil Rights Act of 1964. Unlawful employment
practices based on race, sex and age.**

VII. Requested in Complaint

Class Action: No
Dollar Demand: \$250,000
Jury Demand: No

VIII. This case IS NOT a refiling of a previously dismissed case.

Signature:

Date:

If any of this information is incorrect, please go back to the Civil Cover Sheet Input form using the *Back* button in your browser and change it.
Once correct, print this form, sign and date it and submit it with your new civil action. **Note: You may need to adjust the font size**

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

In the Matter of

Keith Jordan and Barbara Griffin

v.

City Colleges of Chicago, et al.

EASTERN DIVISION

DOCKETING

04 NOV -3 PM 2:10

JUDGE BUCKLO

Case Number:

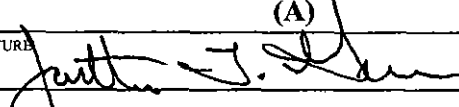
CLERK
U.S. DISTRICT COURT

1407094

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

Keith Jordan and Barbara Griffin

MAGISTRATE JUDGE KEYS

(A)		(B)	
SIGNATURE 		SIGNATURE	
NAME Jonathan T. Green		NAME	
FIRM		FIRM	
STREET ADDRESS 7817 S. Luella		STREET ADDRESS NOV 6 4 2004	
CITY/STATE/ZIP Chicago, IL 60649		CITY/STATE/ZIP	
TELEPHONE NUMBER 773-374-6040	FAX NUMBER	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS jtgreenlaw@hotmail.com		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE		SIGNATURE	
NAME		NAME	
FIRM		FIRM	
STREET ADDRESS		STREET ADDRESS	
CITY/STATE/ZIP		CITY/STATE/ZIP	
TELEPHONE NUMBER	FAX NUMBER	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS		E-MAIL ADDRESS	
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TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	

1-3